

## STATE OF SOUTH CAROLINA

## (Caption of Case)

In Re: Friends of the Earth and Sierra Club v.  
SCE&G, etc.  
Docket Nos. 2017-207--E, 2017-305-E and 2017-370-  
E

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2017 - 207 - E

(Please type or print)

Submitted by: Robert GuildSC Bar Number: 2358Address: 314 Pall Mall St.Telephone: (803)917 5738Columbia, SC 29201

Fax: \_\_\_\_\_

Other: \_\_\_\_\_

Email: BGUILD@MINDSPRING.COM

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: \_\_\_\_\_

## INDUSTRY (Check one)

- ☒ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☐ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other: \_\_\_\_\_

## NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input checked="" type="checkbox"/> Letter                 | <input type="checkbox"/> Request                               |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification             |
| <input type="checkbox"/> Answer                    | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation             |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement                      |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment                      |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter                    |
| <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                              |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery                 |
| <input type="checkbox"/> Complaint                 | <input type="checkbox"/> Petition to Intervene             | <input type="checkbox"/> Return to Petition                    |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation                           |
| <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                              |
| <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                                |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input checked="" type="checkbox"/> Other: <u>witness list</u> |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

Print Form

Reset Form



# ROBERT GUILD

Attorney at Law

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BY ELECTRONIC FILING AND SERVICE

October 15, 2018

Ms. Jocelyn D. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

In Re: Friends of the Earth and Sierra Club v. SCE&G, etc.  
Docket Nos. 2017-207--E, 2017-305-E and 2017-370-E

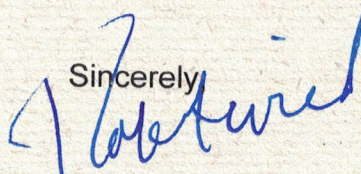
Dear Ms. Boyd:

Pursuant to Hearing Officer Directive, Order No. 2018-130-H, Friends of the Earth and Sierra Club hereby submit the attached list of potential "Non-Prefiled Witnesses," whose testimony may be offered at the hearing in these consolidated cases, either in person by compelled process or by recorded deposition. Because significant discovery disputes remain unresolved and the testimony of witnesses at hearing may give rise to the need to call additional responsive witnesses, we reserve our right to call additional witnesses for good cause.

In addition, as requested, we ask that seating in the hearing room be reserved for Tom Clements and Pamela Greenlaw, as client representatives.

With kind regards I am

Sincerely



Robert Guild

Encl.s

CC: All Parties





FRIENDS OF THE EARTH AND SIERRA CLUB POTENTIAL NON-PREFILED WITNESSES

1. William Timmerman
2. Kevin Marsh
3. Stephen Byrne
4. Carlette Walker
5. Iris Griffin
6. SCE&G Rule 30(b)(6) witness(es)
7. Westinghouse Electric Company ("WEC") Rule 30(b)(6) witness(es)
8. Chicago Bridge & Iron (CB&I") Rule 30(b)(6) witness(es)
9. Ty Troutman, General Manager, Nuclear Power, Bechtel
10. Lonnie Carter
11. Michael Crosby
12. George Wenick
13. Ronald A. Jones
14. Brian McIntyre
15. Dan Magnarelli
16. Terry Elam
17. Danny Roderick
18. Marion Cherry
19. Ken Browne
20. Jeff Hawkins
21. Gary Flowers
22. Mike Couick
23. Gene Sault
24. Allyn Powell
25. Dukes Scott
26. John Flitter